

REMARKS

The Examiner has rejected claims 1-6 under 35 U.S.C. § 102(b) as being anticipated by Maue et al. (US 5,478,244), but has not rejected claims 7-10. The applicant respectfully disagrees that the prior art discloses an integrated module structure disclosing the use of one connector for each wire harness. While the general elements of fuses, relays, and PCBs are installed in the junction box of Maue, it is a unique and novel configuration of these elements that enables each harness to have a single multi-pole connector.

A representative of the applicant spoke with the Examiner over the phone on February 5, 2008. The Examiner clarified that he had compared Maue with the present application based on the disclosure of the mentioned elements (two PCBs, wire harness, etc.). The applicant pointed out that it is the unique configuration of the PCBs in relation to each other that distinguish the present invention and now has amended the independent claim 1 to more clearly define the disclosed invention.

The Examiner also mentioned that the Maue terminals 99, 100 were equivalent to the I/O terminals of the second PCB which integrate with the first PCB. The representative then explained that the Maue terminals 99, 100 connect primarily to external elements of the circuit: fuses 15 and relays 17. Col. 4, lines 57-59. Although terminals 99 do connect with internal metal traces 67, these form connections between the ABS main relay 405 and various instrument panel functions and do not constitute a PCB connecting unit for electrically connecting the first and second PCBs directly. The Examiner stated that with some clarification, the present application would be reassessed.

To more clearly define the unique configuration of the present invention, independent claim 1 has been amended to show that the PCB connecting unit directly connects the first PCB to the second PCB. That is, the upper PCB 10 directly connects with the lower PCB 20 through the lower PCB I/O terminals. There is no equivalent to this direct connection in the Maue circuit where the Maue terminals 99,100 connect to external devices.

An anticipation requires that the prior art reference must either expressly or inherently disclose each and every limitation in a claim. *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). The identical invention must be shown in as complete detail as is contained in the claim. *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). Also, the elements must be arranged as required by the claim. *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

The Examiner is also invited to review Section 2131 of MPEP, entitled "2131

Anticipation - Application of 35 U.S.C. § 102 (a), (b), and (e)

It bears repeating that every element or function must be explicitly or inherently disclosed in the reference. To say it could be this or it could be that is the antithesis of an anticipation. It makes the rejection an oxymoron.

Claims 1 through 10 are pending in the application upon entry of the above amendments. Support for the claims and amendments exist in the specification as filed and in the specification and claims of the PCT application to which this application claims priority under 35 USC § 371. No new matter has been added. Favorable consideration of the pending claims is respectfully requested.

Should the Examiner believe that a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact Applicants' undersigned attorney at the telephone number listed below.

In the event any fees are due in connection with the filing of this document, the Commissioner is hereby authorized to charge said fees to our Deposit Account No. 18-0988.

The claims as amended are not anticipated or obvious over the applied or prior art. The application is now believed to be in a condition of allowance. Early action to that effect is eagerly solicited.

Respectfully submitted,



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